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Attorney for Christopher Busby

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER BUSBY,

Defendant.

Case No. 2:15-cr-00353-GMN-NJK

**Stipulation and Order to Extend Deadline
to file Reply in Support of Defendant's
Supplement to Compassionate Release
(Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by Jacqueline Tirinnanzi, counsel for Christopher Busby, and Nadia Ahmed, counsel for the United States of America, that the deadline on which defendant must file their reply to the government's response to defendant's motion in support of compassionate release ordered due on or before May 31, 2024, (ECF No. 240), be extended 7 days to date on or before June 7, 2024.

This stipulation is entered into based upon the following reasons:

1. Counsel for defendant was appointed to Mr. Busby to supplement his motion for compassionate release on February 27, 2024. (ECF No. 220).
2. This Court issued an order requiring that counsel must either file a supplement to the motion for compassionate release (or file a notice that no supplement is needed) on or before April 5, 2024. Both parties were permitted continuances, resulting in defendant's supplement to the motion for compassionate release being filed on April

12, 2024 (ECF No. 227) and the government's response being filed on May 10, 2024 (ECF No. 237).

3. On May 10, 2024, the parties were made aware by USMS that Mr. Busby was attacked by another inmate at Nevada Southern Detention Center that resulted in a facial fracture, among other serious injuries. Mr. Busby was transported to an outside hospital and is currently awaiting emergency surgery.
4. Counsel for Mr. Busby is still in the process of obtaining documentation and records relevant to the assault. Further communication with the client, who is hospitalized, is also required to finalize Mr. Busby's reply.
5. The parties agree to the extension of time.
6. This is the first request for an extension of time to file defendant's reply.

Dated this 31st day of May 2024.

Respectfully Submitted,

/s/ Nadia Ahmed
NADIA AHMED
Assistant United States Attorney

/s/ Jacqueline Tirinnanzi
JACQUELINE TIRINNANZI, ESQ.
Counsel for Christopher Busby

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Order

Based upon the stipulation of counsel, and good cause appearing, IT IS HEREBY ORDERED that defendant's reply to the government's response to defendant's motion in support of compassionate release shall be due on or before June 7, 2024.

DATED: June 10, 2024


THE HONORABLE GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE